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8 IN THE UNITED STATES DISTRICT COURT FOR THE
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,)	CR-S-05-113-LKK
)	
12 Plaintiff,)	APPLICATION FOR RELEASE
)	OF POST-INDICTMENT
13 v.)	RESTRAINING ORDER AND
)	ORDER THEREON
14 SERGIO CURIEL, SR., and)	
15 CELINA CURIEL,)	
)	
16 Defendants.)	

17 The United States makes application to this Court, to allow it
18 to release the Restraining Order authorizing the freezing of bank
19 accounts. As grounds therefor, the Government states as follows:

20 1. On March 18, 2005, pursuant to 21 U.S.C., § 853(e)(1)(A),
21 this Court authorized a Post-Indictment Restraining Order on the
22 following bank accounts:

23 All funds in the Bank of Stockton account number 21-
24 07567-0-00, held in the name of Sergio Toscano
Curiel, and

25 All funds in the Bank of Stockton account number 23-
26 17177-4-00, held in the name of Celina Curiel.

27 2. On March 18, 2005, Federal Bureau of Investigation ("FBI")
28 Special Agent John Hayes served the Post-Indictment Restraining

Order on Rita Cordova, Assistant Vice President, at the Bank of Stockton located at 301 E. Miner Street, Stockton, California, and thereafter account number 21-07567-0-00 held in the name of Sergio Toscano Curiel was frozen.

3. On March 18, 2005, FBI Special Agent Rodrigo Riveros served the Post-Indictment Restraining Order on William C. Allen, Assistant Vice President, at the Bank of Stockton located at 120 W. Walnut Street, Lodi, California, and thereafter account number 23-17177-4-00 held in the name of Celina Curiel was frozen.

4. Pursuant to the agreement with defendants Sergio Curiel, Sr. and Celina Curiel, the United States respectfully requests that the Court allow it to release the Bank of Stockton bank accounts referenced above.

Dated: 6/22/07

Respectfully submitted,

McGREGOR W. SCOTT
United States Attorney

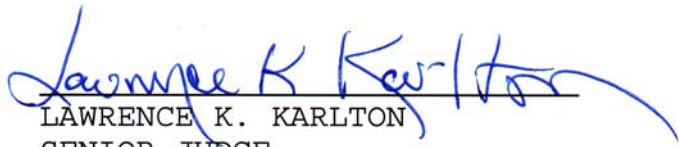
/s/ Mary L. Grad
MARY L. GRAD
Assistant U.S. Attorney

ORDER

The Court having considered the foregoing, and good cause appearing therefrom, the Proposed Order for Release of the Post-Indictment Restraining Order is hereby APPROVED.

It is so ORDERED.

Dated: June 25, 2007


LAWRENCE K. KARLTON
SENIOR JUDGE
UNITED STATES DISTRICT COURT